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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION

13 BOUNDARY SOLUTIONS, INC., a California
14 corporation,

15 Plaintiff,

16 v.

17 CORELOGIC, INC., a Delaware corporation,

18 Defendant.

Case No. 5:14-cv-00761-PSG

**DECLARATION OF JAMES
SKURZYNSKI IN SUPPORT OF
PLAINTIFF BOUNDARY SOLUTIONS
INC.'S ADMINISTRATIVE MOTION
TO FILE UNDER SEAL (DKT. NO. 109)
PURSUANT TO CIVIL L.R. 79-5(E)(1)**

1 I, James Skurzynski, declare:

2 1. I am President and CEO at Digital Map Products, Inc. ("DMP"). Except as
3 otherwise noted, I have personal knowledge of the facts stated below, and if called upon to testify
4 to those facts, I could and would competently do so.

5 2. I am providing this declaration to establish the confidentiality of certain documents
6 pursuant to Civil Local Rule 79-5. Specifically, I am informed that Plaintiff Boundary Solutions,
7 Inc. ("BSI") has submitted several confidential DMP documents as exhibits to the Declaration of
8 Bruce J. Wecker in Opposition to CoreLogic's Motion to Amend Its Counterclaim ("Wecker
9 Declaration"). As discussed below, these exhibits contain sensitive and confidential DMP
10 information and should remained sealed from the public record.

11 3. Exhibit 1 to the Wecker Declaration is a document bearing Bates number
12 DMP000060. This document shows DMP's licensing terms with Culver City.

13 4. Exhibit 4 to the Wecker Declaration is a document bearing Bates numbers
14 DMP124375-124415. This document is DMP's Business Plan for 2001.

15 5. Exhibit 6 to the Wecker Declaration is a document bearing Bates numbers
16 DMP127193-95. This document is a letter to investors from DMP Chairman Timothy Psomos.

17 6. Exhibit 7 to the Wecker Declaration is a document bearing Bates numbers
18 DMP084577-690. This is an October 21, 2013 email from Mary Kane to Ron Cast with
19 attachments.

20 7. Exhibit 8 to the Wecker Declaration is a snapshot of a portion of the load file
21 provided by DMP.

22 8. Exhibit 10 to the Wecker Declaration is a document bearing Bates numbers
23 DMP058194-97.

24 9. Exhibit 11 to the Wecker Declaration is a document bearing Bates numbers
25 (DMP058218-21). These documents include an email from James Skurzynski to Marty Frame
26 dated November 30, 2010.

27 10. The DMP Exhibits that BSI seeks to file under seal contain non-public information
28 about DMP, its decision-making process and trade secret information. This information is

1 sensitive and treated as confidential by DMP. The public disclosure of this information would be
2 harmful to DMP because the information could be used by DMP's competitors to gain a
3 competitive advantage in their business operations, or used by others to exploit potential security
4 vulnerabilities in DMP's work product.

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6 I declare under penalty of perjury under the laws of the United States that the foregoing is
7 true and correct.

8 Executed on May 18, 2015 in Irvine, CA.

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10 By:  James Skurzynski
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